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PACIFIC BELL TELEPHONE COMPANY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CALIFORNIA SPORTFISHING
PROTECTION ALLIANCE,

Plaintiff,

vs.

PACIFIC BELL TELEPHONE COMPANY,

Defendant.

CASE NO. 2:21-cv-00073-JDP

**DEFENDANT PACIFIC BELL
TELEPHONE COMPANY'S
MEMORANDUM IN SUPPORT OF
MOTION FOR LEAVE TO SUBMIT
REDACTED EXHIBIT "A" TO THE
DECLARATION OF JON DAVID
KELLEY IN SUPPORT OF
DEFENDANT'S OPPOSITION TO
PLAINTIFF'S MOTION FOR
ATTORNEYS' FEES AND COSTS**

Judge: Hon. Jeremy D. Peterson
Courtroom: 9

Action Filed: January 14, 2021
Trial Date: None

MEMORANDUM OF POINTS AND AUTHORITIES

On November 21, 2024, Defendant Pacific Bell filed its Opposition to Plaintiff's Motion for Attorneys' Fees and Costs (Dkt. 171) (the "Opposition"). Through an administrative error, an unredacted copy of a document produced by BTB/MTS was filed as Exhibit A to the Opposition (Dkt. 171-3). Upon learning of the error, counsel for Pacific Bell conferred via email and telephone with counsel for BTB/MTS and promptly notified the Court through its courtroom deputy, Mr. Nicholas Cannarozzi. Mr. Cannarozzi temporarily sealed the document and advised counsel to file this motion to submit the redacted version of Exhibit A in place of the sealed version.

For the foregoing reasons, Pacific Bell respectfully requests that the Court grant its Motion for Leave to Submit Redacted Exhibit A to the Declaration of Jon David Kelley in Support of Defendant's Opposition to Plaintiff's Motion for Attorneys' Fees and Costs, and replace the sealed version of Exhibit A (Dkt. 171-3) with the redacted version attached hereto as Exhibit 1. A proposed order is submitted herewith for the Court's consideration.

DATED: November 22, 2024

Respectfully submitted,

/s/ Hariklia Karis

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